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UBER TECHNOLOGIES, INC.
18 and OTTOMOTTO LLC

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,
27 Defendants.
28

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
THEIR RESPONSES TO COURT'S
QUESTIONS 1-2 AND 5-8 FOR
FURTHER HEARING ON MOTION
TO STRIKE ASSERTED TRADE
SECRET NUMBER 96**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Their Responses to Court's Questions 1-2 and 5-8 for Further Hearing on Motion to Strike Asserted Trade Secret Number 96.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Responses to Court's Questions 1-2 and 5-8 for Further Hearing on Motion to Strike ("Responses")	Highlighted Portions	Plaintiff (green) Defendants (blue)
Exhibit A	Entirety	Plaintiff Defendants
Exhibit B	Entirety	Plaintiff Defendants Third-party Velodyne

3. The blue-highlighted portions of the Responses and the entireties of Exhibits A and B contain highly confidential information regarding the technical details of Uber's LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical features of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed.

4. The entirety of Exhibit B contains highly confidential technical information of third-party Velodyne. Defendants request the Court keep this third-party's technical information sealed in order to protect its competitive standing.

